

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS,)	
Plaintiff,)	
)	
V.)	
)	
ERIC H. HOLDER, JR.,)	
in his official capacity)	
as Attorney General of)	
the United States,)	
Defendant.)	
)	
ERIC KENNIE, et al.,)	
Defendant-Intervenors,)	
)	
TEXAS STATE CONFERENCE)	CASE NO. 1:12-CV-00128
OF NAACP BRANCHES, et al.,)	(RMC-DST-RLW)
Defendant-intervenors,)	Three-Judge Court
)	
TEXAS LEAGUE OF YOUNG)	
VOTERS EDUCATION FUND, et al.,)	
Defendant-Intervenors,)	
)	
TEXAS LEGISLATIVE BLACK)	
CAUCUS, et al.,)	
Defendant-Intervenors,)	
)	
VICTORIA RODRIGUEZ, et al.,)	
Defendant-Intervenors.)	

ORAL DEPOSITION OF
REPRESENTATIVE PATRICIA HARLESS
May 15, 2012

ORAL DEPOSITION OF REPRESENTATIVE PATRICIA HARLESS, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause on the 15th day May, 2012, from 9:42 a.m. to 7:11 p.m., before Amy C. Kofron, CSR in and for the State of Texas, reported by machine shorthand, at the offices of the United States Attorney, 816 Congress Avenue, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

1 MR. FREEMAN: If I can mark this as U.S. Exhibit 12.

2 (Exhibit No. 12 marked)

3 Q. I guess that copy is for you. Could you take a look
4 at this document? Have you seen this document before?

5 A. Not that I recall.

6 Q. Do you see on the second-to-last line of the first
7 page where it says "fast track"?

8 A. I see that.

9 Q. Do you have any idea what that means?

10 A. I know that the voter ID legislation was an emergency
11 item for the governor's office.

12 Q. Were there other emergency items for the governor's
13 office?

14 A. Yes.

15 Q. Were those assigned to fast-track select committees?

16 A. I don't recall.

17 Q. Were there any other fast-track select committees in
18 the 82nd legislature in 2011?

19 A. I can't answer 100 percent sure, but I think that the
20 state sovereignty committee was a select committee. The
21 government reform committee was a select committee for
22 government for the governor's emergency items. I think there
23 were more than just this that were the governor's emergency
24 items that had select committees.

25 Q. But if you look on this document below "Fast Track

1 Select Committee on Voter Identification and Voter Fraud," do
2 you see "Select Committee on State Sovereignty"?

3 A. I do.

4 Q. Is that designated a fast-track committee?

5 A. It doesn't -- it doesn't say that in this document.

6 Q. Are you aware of any other fast-track committees
7 having been established in the sessions of the legislature in
8 which you served?

9 A. I can't answer that. I didn't write this, so I can't
10 answer that.

11 Q. But are you aware of any other committees being
12 designated as fast-track committees?

13 A. I don't know for sure.

14 Q. Okay. So you're not aware?

15 A. I'm not aware.

16 Q. Thank you.

17 A. No. I can't say I'm not -- I don't recall.

18 Q. Okay. How many bills did the Select Committee on
19 Voter Identification and Voter Fraud consider?

20 A. We had a hearing on just the one.

21 Q. Okay. Are there any other examples of committees of
22 which you are aware that heard only one bill?

23 A. I don't know.

24 Q. So you're not aware of any other examples of a
25 committee that has heard only one bill?

1 A. I don't know if there were any other committees that
2 only heard one bill. There's like 30-plus committees, and I
3 have my hands full with my committee.

4 Q. No. I understand. I'm just asking: To your
5 knowledge, you don't --

6 A. Not to my knowledge.

7 Q. -- you're not aware of any other?

8 A. I don't remember.

9 Q. Okay. Thank you.

10 Were there any bills submitted in the 82nd legislature
11 to address mail-in voter fraud?

12 A. Any committees?

13 Q. Any bills submitted?

14 A. Yes, I think there were.

15 Q. Were those referred to the Select Committee on Voter
16 Identification and Voter Fraud?

17 A. If they were, we did not hear them.

18 Q. Okay.

19 A. I'm not sure where they referred them, but we did not
20 have a hearing on them.

21 Q. If I can just -- we can just clean this up real
22 quickly, if I can have this marked U.S. Exhibit 13.

23 (Exhibit No. 13 marked)

24 MR. SWEETEN: That last one was 12?

25 MR. FREEMAN: Yes.